

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LAZAR MACOVSKI, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

GROUPON, INC., RICH WILLIAMS, and
MELISSA THOMAS,

Defendants.

Case No. 1:20-cv-02581

Honorable Matthew F. Kennelly

**JOINT MOTION FOR EXTENSION OF TIME TO FILE A STIPULATION OF
SETTLEMENT AND MOTION FOR PRELIMINARY APPROVAL**

Court-appointed Lead Plaintiff Fadi E. Rahal (“Lead Plaintiff”), and Defendants Groupon, Inc., Rich Williams, and Melissa Thomas (the “Defendants,” and collectively with Lead Plaintiff, the “Parties”), by and through their respective counsel, respectfully move for an order extending the deadline for the Parties to file a stipulation of settlement and to move for preliminary approval of that settlement:

1. Lead Plaintiff’s Motion for Preliminary Approval of Settlement is due to be filed on June 20, 2022, per the Court’s Minute Entry Order, dated May 10, 2022 [Dkt. No. 103].
2. June 20, 2022 is a legal public holiday.
3. The Parties have been diligently working on the stipulation of settlement and exhibits thereto, including: (a) [Proposed] Order Preliminarily Approving Settlement and Providing Notice; (b) Notice of Class Action Settlement; (c) Proof of Claim Form and Release; (d) Summary Notice of Class Action Settlement; and (e) [Proposed] Judgment Approving Class Action Settlement. However, due to the intervening public holiday and the many constituencies involved in the review and approval of the settlement terms, the Parties seek additional time to

finalize the stipulation of settlement and exhibits thereto.

4. Accordingly, the Parties respectfully request that the Court extend the deadline for the Parties to file their stipulation of settlement and move for preliminary approval by 7 days, to June 27, 2022.

5. This is the Parties' first request to extend this deadline.

WHEREFORE, Lead Plaintiff Fadi E. Rahal, and Defendants Groupon, Inc., Rich Williams, and Melissa Thomas respectfully request this Court enter an Order extending the time in which they must file a stipulation of settlement and Lead Plaintiff must move for preliminary approval to June 27, 2022.

Respectfully submitted,

June 14, 2022

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